

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED  
APR 6 9 44 AM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORY OF UNITED  
PARCEL SERVICE TO UNITED STATES POSTAL  
SERVICE WITNESS DEGEN  
(UPS/USPS-T16-8)  
(April 6, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
serves this follow-up interrogatory directed to United States Postal Service witness

Degen: UPS/USPS-T16-8.

Respectfully submitted,



John E. McKeever  
William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe L.L.P.  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3310  
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

Of Counsel.

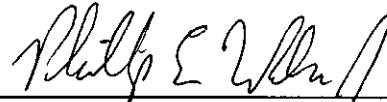
FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS DEGEN

UPS/USPS-T16-8. Refer to your response to interrogatory UPS/USPS-T16-7.

- a. With respect to your reference to witness Van-Ty-Smith's response to TW/USPS-T17-4, provide all SAS programs used to create the tables referenced in response to TW/USPS-T17-4 in hardcopy and electronic format.
- b. Describe in detail how the LDC cost pools were separated into the non-MODS cost pool classifications.
- c. Confirm that the costs discussed in witness Van-Ty-Smith's response to TW/USPS-T17-4 that you referenced in your response to UPS/USPS-T16-7 were for all subclasses of mail and not just for parcel post.
- d. Confirm that the costs discussed in witness Van-Ty-Smith's response to TW/USPS-T17-4 that you referenced in your response to UPS/USPS-T16-7 were only for cost segment 3.1.
- e. Describe the activities that would be considered "outgoing" for the LDC 43 portion of each of the non-MODS cost pools (Allied, Auto Distr, Express, etc.) separately for each non-MODS cost pool.
- f. Describe the activities that would be considered "incoming" for the LDC 43 portion of each of the non-MODS cost pools (Allied, Auto Distr, Express, etc.) separately for each non-MODS cost pool.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

A handwritten signature in black ink, appearing to read "Phillip E. Wilson, Jr.", written over a horizontal line.

Phillip Wilson, Jr., Esquire  
Attorney for United Parcel Service

Dated: April 6, 2000  
Philadelphia, Pa.